

THE
ROTH LAW FIRM
PLLC

October 12, 2022

VIA ECF

Hon. John G. Koeltl
United States District Court
Southern District of New York
500 Pearl Street, 14A
New York, NY 10007-1312

Re: Margaret Ratner Kunstler et. al. v. Central Intelligence Agency et. al.
Case 1:22-cv-06913 // Request to Adjourn Preliminary Conference on 10/17/22

Hon. Koeltl:

We represent the Plaintiffs in the above-captioned matter. We are writing to respectfully request an adjournment of the preliminary conference in this matter currently scheduled for October 17, 2022 (the “Preliminary Conference”) to allow for the completion of service of process on all Defendants. This is Plaintiffs’ first request for an adjournment of the Preliminary Conference.

There are four defendants in this action, two located in the United States and two located in Spain. With respect to the domestic defendants, Central Intelligence Agency and Michael Pompeo, Plaintiffs have the Summons and Complaint out for service and expect the documents to be served on these defendants tomorrow.

Plaintiffs had difficulty locating the accurate addresses for the two Spanish defendants, David Morales (“Morales”), a Spanish citizen, and Undercover Global S.L. (“UC Global”), a Spanish corporation. Plaintiffs now believe they have the correct addresses and will serve defendants Morales and UC Global pursuant to Rule 4(f)(C)(ii) and in compliance with the Hague Convention on the Service Abroad of Judicial and Extrajudicial Documents.

Plaintiffs, therefore, respectfully request that the Court adjourn the Preliminary Conference so that Plaintiffs can complete service and all defendants can appear before the Court at the Preliminary Conference.

Respectfully Submitted



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